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March 28, 2016

**VIA ECF**

Hon. George B. Daniels  
United States District Judge  
United States District Court  
for the Southern District of New York  
500 Pearl Street  
New York, New York 10007-1312

Re: *Sokolow, et al. v. Palestinian Liberation Organization, et al.*  
Docket No. 04-CV-397 (GBD)(RLE)

Dear Judge Daniels:

This firm represents the plaintiffs in the above-referenced case. I write to request that the Court impose an additional condition on its interim stay of enforcement of the judgment.

Some years ago, Defendants deposited \$1 million into the registry of the United States District Court for the District of Columbia, as a result of an order by Judge Kessler of that Court in *Gilmore v. Palestinian Authority* (Docket No. 01 Civ. 853). Later, Judge Kessler granted summary judgment to Defendants in that case. The *Gilmore* plaintiffs have appealed that decision to the D.C. Circuit.<sup>1</sup>

It has come to our attention that Defendants recently asked Judge Kessler to release the \$1 million deposit that they made in the *Gilmore* case. We respectfully ask that this Court modify its stay of enforcement in this case, by imposing an additional condition of the stay of enforcement of its judgment, as follows:

If Defendants withdraw any funds from the registry of the  
United States District Court for the District of Columbia,

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<sup>1</sup> This firm appeared for the *Gilmore* plaintiffs in the D.C. Circuit, but we do not represent them in the District Court.

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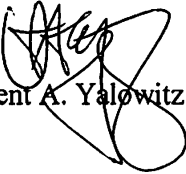
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all such funds shall be added to the registry of this Court as additional security for (and not as a substitute for) the security already required by this Court's order of August 24, 2015.

Such an order would provide additional security for Plaintiffs without burdening Defendants' finances, as the money at issue already is in the United States, was intended to secure Defendant's obligations under the Anti-Terrorism Act, and should remain outside of Defendant's control.

Respectfully,

  
Kent A. Yalowitz

cc: Hon. Gladys Kessler  
All ECF Counsel